

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Paul Maravelias, *
*
Plaintiff, *
v. * Civil No. 1:19-cv-00143-SM
*
John J. Coughlin, et al., *
*
Defendants. *

**DEFENDANT PATRICIA CONWAY’S NOTICE THAT SHE JOINS IN GORDON J.
MACDONALD’S MOTION TO DISMISS**

Patricia Conway, the County Attorney for Rockingham County in her official capacity, by and through her attorneys Sheehan Phinney Bass & Green, P.A., respectfully notifies the Court that she joins in the Motion to Dismiss Pursuant to Rule 12(b)(1) filed on April 17, 2019 by Gordon J. MacDonald, in his official capacity as New Hampshire Attorney General (“Attorney General”). County Attorney Conway also joins in the Motion to Dismiss Pursuant to Rule 12(b)(1) filed on April 17, 2019 by the Hon. John J. Coughlin.

The claims interposed by the Plaintiff against the Attorney General and Judge Coughlin are the same as those made against County Attorney Conway. Accordingly, the County Attorney adopts the subject matter jurisdiction arguments raised in those Motions to Dismiss. Respectfully, this matter runs afoul of the Rooker-Feldman Doctrine and must be dismissed for lack of subject matter jurisdiction. See, e.g., Exxon Mobil Corp. v. Saudi Basic Ind. Corp., 544 U.S. 280, 284 (2005) (the Rooker-Feldman doctrine applies to “cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments”).

As the County Attorney adopts and incorporates those Motions by reference, no further Memorandum of Law is required.

WHEREFORE, Patricia Conway, as Rockingham County Attorney and in her official capacity, respectfully requests that the Court:

- A. Dismiss this action for lack of subject matter jurisdiction;
- B. Grant such other and further relief in favor of the Defendants as the Court deems necessary and just.

Respectfully submitted,

**PATRICIA CONWAY, ROCKINGHAM
COUNTY ATTORNEY, IN HER OFFICIAL
CAPACITY**

By Its attorneys,

**SHEEHAN PHINNEY BASS & GREEN,
PROFESSIONAL ASSOCIATION**

Dated: April 17, 2019

By: /s/ Christopher Cole
Christopher Cole, Esquire (NH Bar No. 8725)
Sheehan Phinney Bass & Green, PA.
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CERTIFICATE OF SERVICE

I hereby certify that, on this 17th day of April 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to Defendant's respective Counsel of Record, and mailed, via Registered Mail, a copy of this Notice to the Plaintiff as follows:

Mr. Paul Maravelias
34 Mockingbird Hill Road
Windham, NH 03087

Date: April 17, 2019

/s/ Christopher Cole
Christopher Cole, Esquire